

The US District Court

District of Massachusetts

FILED  
IN CLERKS OFFICELara  
V. Windsor

Windsor Recovery House? Etal.

2021 NOV.-9 AM 1:15

- 1.) The Complainant has experienced violations of Privacy, Breach of confidentiality communicated to the ~~Windsor Recovery House~~ <sup>US DISTRICT COURT DISTRICT OF MASS.</sup> after on or about October 26, 2021 and several times following that. It was well known while medical staff state full name of detainee, not correct detainee of the no current notices.
- 2.) The Complainant made formal grievances to the manager of the records department who stated there was no HIPAA or Privacy officer at the facility.
- 3.) The Complainant communicated the ongoing breaches of confidentiality and Privacy to M.S. D. Leggett at the Department of Mental Health after 4-5 days of not having resolution to the urgent issue of Facility staff using their cell phones while complainant was being forcibly interviewed by physician assistant "Amy" and psychiatrist after having documented and submitted a refusal of treatment notice upon Complainant. Horrified, confused appearance at approximately 10:30 pm to the facility. The document was given to several facility employees and stated to an unknown doctor, yet staff consistently harassed, knocked on door during the night, entered the room sporadically, then arguments and threats, approximately every 5 minutes.
- 4.) The Complainant was requested to open mail in front of a sifter. The Complainant requested to go into the room to get glasses, was not permitted to do so, then refused the mail apparently from an unknown inmate. The Complainant was refused access to USPS due to being isolated.
- 5.) The Complainant has a restricted diet. Items are constantly missing, or wrong. The Complainant has attempted to resolve these issues through the grievance process without resolution.
- 6.) The Complainant has requested to leave the facility.
- 7.) The Detainee received no information as to rights, policies, procedures at any time.
- 8.) The Complainant is exposed to coronavirus by 5-6' sifter and side the room all night long so that the Complainant has knowledge of the sifter having to go take bus back to school.

The United States District Court  
 District of Massachusetts

~~LORE WINDLER~~  
 Lore Windler

FILED  
 IN CLERKS OFFICE

T. Frank

2021 NOV -9 AM 1:15

attorney at Suffolk house of detention  
 Suffolk county house of correction William or  
 T. Frank warden et al

- 1.) The Petitioner is not a resident of the state of Massachusetts, but is a citizen of the United States. The Petitioner has a liberty interest.
- 2.) The Respondent is a principal in the United States.
- 3.) The Petitioner was arrested by the police department of the principal, The Massachusetts Police Department on or about October 12, (Sunday)
- 4.) The Petitioner has a right to stand trial under Constitutional due process provisions.
- 5.) The Petitioner was not misandized at any point.
- 6.) The Petitioner was afforded an attorney and spoke with that attorney <sup>(briefly 5-10 mins.)</sup> after not having slept for at least 48 hours due to starvation, not having been afforded food whatsoever during the Petitioner's pretrial detention in the Massachusetts state Police department.
- 7.) The Petitioner requested the attorney communicate to the court the sovereign citizen status of the Petitioner and violations of the Constitutional rights of the Petitioner who ~~the Petitioner requested~~ 4th Amendment rights were violated at the time of the arrest.
- 8.) The Petitioner requested the attorney communicate the sovereign citizen status of the Petitioner claiming to the attorney the Petitioner requested the matter be moved to the jurisdiction of the Federal court.
- 9.) The Petitioner was taken to a prison, isolated for approximately two weeks, without access to a telephone or the USPS whatsoever, clergy.
- 10.) At no time did the Petitioner receive communication with the appointed attorney, or access to the courts.
- 11.) The Petitioner experienced horrific misconduct from facility employees who ~~the~~ the Petitioner should not have been



The United States District Court  
District of Massachusetts

exposed to due to their blatant legal conflict with the Petitioners.

- 12.) The Petitioners filed several formal grievances that were returned w/out cause.
- 14.) The Petitioner requested, in writing, several times, provisions provided by the constitution regarding access to the courts, communication w/ an attorney.
- 15.) The Petitioner communicated with an attorney who was employed by the facility for a brief time (5-10 minutes,) having filed the appropriate request slip, enumerating the legal issues to be addressed. (approximately 4-5)
- 16.) The attorney only approached the cell door of the Petitioner after the Petitioner was forced to bang loudly on the door while he was communicating with an other detainee.
- 17.) The attorney reappeared at the door of the inmate within 24 hours, but had not addressed any of the issues documented. The attorney had the request in his possession at that time. The document listed approximately 5 legal issues to be addressed.
- 18.) These issues included, 1<sup>st</sup> amendment rights of detainees, definitions and legal rights concerning someone of sovereign citizenship, use of isolation/seclusion <sup>practices</sup> on detainees, and was requested to contact the court appointed attorney approached the detainees and given the telephone number. He was informed of the PREA allegation made by the detainees while <sup>in isolation</sup>.
- 19.) The attorney stated he would not again be able to research the issues that day, but may return on Monday. The time was approximately 2 pm.
- 20.) The attorney returned Monday afternoon after the detainees attempted to rephrase the detainees' 1<sup>st</sup> amendment rights but was not allowed to do so, causing the detainees to make the request repeatedly, EXTREMELY audibly.

- 21.) When the attorney appeared, the Petitioner asked the attorney directly if he had contacted the court appointed attorney. The facility employed attorney responded that he "did not remember" if he had contacted the court appointed attorney of the detainee.
- 22.) The attorney was requested to take possession of an envelope that did not have a stamp, something which was promised by the attorney. The envelope he was told contained a legal action against certain employees at the facility. The attorney unbelievably left the area while the detainee was attempting to hand the envelope containing the document to the attorney. The detainee had also requested the attorney take possession of all of the documented notes written by the detainee. The attorney agreed, but then left hastily. None of the documents left by the attorney addressed ANY matter requested by the Petitioner.
- 23.) The attorney left an envelope of approximately 100 pages which the Petitioner did not take possession of as it was left outside the cell door. Causing an extremely audible response from the Petitioner.
- 24.) Within 1 hour, the Petitioner was summoned to another area of the facility and moved to an undisclosed location. The Petitioner requested of the van driver information of the detainee's destination. The driver of the van stated that the Petitioner was being moved to a rehabilitation / drug recovery facility. The terrified petitioner asked the van driver and made statements that violated fifth amendment rights.
- 25.) The Petitioner asserts that there has been inadequate (if any) legal representation afforded of under the 1<sup>st</sup> Amendment provisions and debilitating violations to due process provisions, so that the Petitioner has no information regarding the legal disposition of the matters of which the Petitioner is accused; or any rights to be relied upon currently.
- 26.) The Petitioner asserts that Federal evidence concerning this matter was taken from the Court by the driver of the van from the Massachusetts State Police and requests the court take jurisdiction of the matter and requests immediate release from the facility in which the Petitioner is housed.



State of Massachusetts

The Complainant requests to proceed in forma pauperis and have the matter sealed due to the highly contentious nature of the matter as well as the assertion that the Complainant has experienced harassment by the Respondents in the matter, to an unfathomable degree. The Complainant wishes to proceed by pseudonym.

Pro Se  
~~Sealed~~/pro se  
No Fixed Address

the United States District Court  
 District of Massachusetts

Exhibit  
 210-4811

"WellPath" and its employees

Suffolk County House of Corrections Commissioners Thompson / Williams /  
 Suffolk County Sheriff's Department et al other employees

### FACTS

- 1.) The Plaintiff is not a resident of the state, but is a citizen of the United States
- 2.) The Defendant operates a business in and or is a municipality in the state.
- 3.) The Defendant did commit medical malpractice against the Plaintiff and violated the federally mandated PREA regulations repeatedly (Prison Rape Elimination Act) by acts including but not limited to harassing the detainee while in medical section, running water repeatedly on and off at all hours of day and night above the cell of the detainee after her repeated refusal to participate in the medical intake process. The detainee was requested every shift (sometimes at 12:30 am) to repeatedly sign the same document. The detainee was coerced repeatedly to sign the participate in the medical intake, was refused 1<sup>st</sup> Amendment rights when refused, threatened to be put in a "tunn" and safety mask if she did not answer questions, was repeatedly exposed to water



harassment by guards, ~~at~~ some time, after repeated approaches to the cell door of the detainee just before / during or after being in the area of the toilet, or coughing loudly f. on the desk at these times, escalating the behavior after the detainee reported to a nurse (without any response) harassing the detainee late at night using all of the above techniques - rather running above cell, approaching cell door at inappropriate times, approaching the door shining bright flashlight in the eyes of the detainee, and even after a PREA report or allegation had formally been documented, the behavior continued, provoking an out loud response from the detainee, the Defendant then addressed the detainee (while mechanically isolated over seven days, without appropriate diet) casually and informally, condescendingly, addressing the detainee as if the 250 LB male had some familiarity with the detainee. The detainee had never seen or spoken to the Defendant whatsoever.

The Defendant had asked a housing officer the appropriate means of acquiring a stamped envelope as the detainee had no access to the telephone. The detainee was informed to file a document, which she did on more than one occasion, yet the documents were not picked up for more than 6 or 7 days. The detainee was informed that the form was only allowed on one day of the week, yet when requested, NO form was given, causing the





detainee to wait another entire week to  
access the U.S. Postal Service. At this time,  
the detainee has already been secluded for  
seven days w/out any communication with an  
attorney or clergy concerning the plight of the detainee.  
Wherefore, the Plaintiff requests in the amount of  
\$ 500,000 U.S.

The Plaintiff was exposed to horrific harassment  
24 hours / day for at least 24 days w/out  
access to the courts or an attorney

Pro Se  
2104811  
No Fixed Address

Plaintiff has been secluded w/out access  
to a lawyer / USPS / clergy for 2 weeks

from attorney at  
correction facility

rights that remain open to inmates; whether accommodation of asserted rights will have significant "ripple effect" on fellow inmates or prison staff; and whether there is ready alternative to regulation that fully accommodates prisoners' rights at de minimis cost to valid penological interest.

7400 Cases that cite this headnote

5

## Prisons

Prison regulation which impinges on inmates' constitutional rights cannot be sustained as "reasonably related" to legitimate penological interest, where logical connection between regulation and asserted goal is so remote as to render



310

310II

310II(A)

310k112

(Formerly 310k4(1))

Prisons

Prisoners and Inmates

In General

Regulation and supervision in general; role of courts

Notes

Quick Check



**3 Prisons****310**

When  
prison  
regulation  
impinges on  
inmates'  
constitution  
al rights,  
regulation  
is valid if it  
is  
reasonably  
related to  
legitimate  
penological  
interest.

**310II****310II(A)****310k112***(Formerly 310k4(1))*

5603 Cases  
that cite  
this  
headnote

Prisons

Prisoners and  
Inmates

In General

Regulation and  
supervision in  
general; role of  
courts**4 Prisons****310**

In deciding  
whether  
prison  
regulation  
which  
impinges on  
inmates'  
constitution  
al rights  
can be  
sustained  
as  
“reasonably  
related” to  
legitimate  
penological  
interest,  
court  
should  
consider:  
whether  
there is  
valid,  
rational  
connection  
between  
prison  
regulation  
and  
legitimate  
government  
al interest  
put forward  
to justify it;  
whether  
there are  
alternative  
means of  
exercising

**310II****310II(A)****310k112***(Formerly 310k4(1))*

Prisons

Prisoners and  
Inmates

In General

Regulation and  
supervision in  
general; role of  
courts

Notes

Quick  
Check

that would  
fully  
accommod  
ate  
prisoner's  
rights at de  
minimis  
cost to valid  
penological  
interest,  
then court  
may  
consider  
this as  
evidence  
that  
regulation  
is not  
reasonably  
related to  
valid  
penological  
interest.

2706 Cases  
that cite  
this  
headnote

Notes

Quick  
Check

8 Prisons  
Inmate-to-  
inmate  
correspond  
ence rule,  
permitting  
correspond  
ence  
between  
immediate  
family  
members  
who were  
inmates at  
different  
institutions  
or to extent  
it related to  
legal  
matters, but  
allowing  
other  
inmate  
correspond  
ence only if  
it was in  
best  
interest of  
parties, was  
"reasonably  
related" to  
legitimate  
security  
concerns of  
prison



310

310II

310II(B)

310k144

310k148

(Formerly 310k4(9))


Prisons

Prisoners and  
InmatesCare, Custody,  
Confinement, and  
ControlMail and  
CorrespondenceInternal; inmate-  
to-inmate



policy  
arbitrary or  
irrational,  
or where  
goal is not  
legitimate  
and neutral  
one.


3906 Cases  
that cite  
this  
headnote

6 Prisons   
310  
When  
accommod  
ation of  
inmate's  
asserted  
constitution  
al right will  
have  
significant  
"ripple  
effect" on  
fellow  
inmates or  
on prison  
staff, courts  
should be  
particularly  
deferential  
to informed  
discretion  
of  
corrections  
officials in  
adopting  
regulation  
which  
impinges on  
that right.  
  
466 Cases  
that cite  
this  
headnote  
  
(Formerly 310k4(1))

Prisons  
  
Prisoners and  
Inmates  
  
In General  
  
Regulation and  
supervision in  
general; role of  
courts

Notes

Quick  
Check

7 Prisons   
310  
If inmate  
who  
challenges  
prison  
regulation  
as violation  
of  
constitution  
al rights  
can point to  
alternative  
regulation  
  
(Formerly 310k4(1))

Prisons  
  
Prisoners and  
Inmates  
  
In General  
  
Regulation and  
supervision in  
general; role of  
courts

**253k228** Civil status or  
condition

(Formerly 253k9, 310k4(5))



**310** Prisons

**310II** Prisoners and  
Inmates

**310II(A)** In General

**310k113** Particular rights  
and disabilities

(Formerly 310k4(5))

**11 Marriage  
and  
Cohabitation**



**253** Marriage and  
Cohabitation

**Prisons**

**253III**

Creation,  
Existence, and  
Validity of Marital  
Relationship

Inmate  
marriage  
regulation,  
which  
prohibited  
inmates  
from  
marrying  
other

**253III(A)**

In General;  
Requisites and  
Essentials

inmates or  
civilians  
unless  
prison  
superintend  
ent  
approved  
marriage  
after finding  
that there  
were

**253k221**

Persons Who May  
Marry

compelling  
reasons for  
doing so,  
was not  
reasonably  
related to  
any  
legitimate  
penological  
objective,  
so as to be  
facially  
invalid as  
denial of  
inmates'  
constitution  
al rights.

**253k228**

Civil status or  
condition

(Formerly 253k9, 310k4(5))



**310** Prisons

**310II** Prisoners and  
Inmates

**310II(A)** In General

**310k113** Particular rights  
and disabilities

(Formerly 310k4(5))

U.S.C.A.  
Const.Amen  
ds. 1, 14.

218 Cases  
that cite

Notes

Quick  
Check



officials, so  
as not to be  
facially  
invalid.  
U.S.C.A.  
Const.Amen  
ds. 1, 14.

343 Cases  
that cite  
this  
headnote

**9 Marriage  
and  
Cohabitation**

**Prisons**

**Right to  
marry, like  
many other  
rights, is  
subject to  
substantial  
restrictions  
as result of  
incarceratio  
n.**

90 Cases  
that cite  
this  
headnote



**253**

**253III**

**253III(A)**

**253k221**

**253k228**

*(Formerly 253k9, 310k4(5))*



**310**

**310II**

**310II(A)**

**310k113**

*(Formerly 310k4(5))*

**Marriage and  
Cohabitation**

**Creation,  
Existence, and  
Validity of Marital  
Relationship**

**In General;  
Requisites and  
Essentials**

**Persons Who May  
Marry**

**Civil status or  
condition**

**Prisons**

**Prisoners and  
Inmates**

**In General**

**Particular rights  
and disabilities**

**10 Constitutio  
nal Law**

**Marriage  
and  
Cohabitatio  
n**

**Prisons**

**Right of  
inmate to  
marry is  
one  
protected  
by  
Constitutio  
n.**

183 Cases  
that cite  
this  
headnote



**92**

**92VII**

**92VII(B)**

**92k1093**

*(Formerly 92k82(13))*



**253**

**253III**

**253III(A)**

**253k221**

**Constitutional Law**

**Constitutional  
Rights in General**

**Particular  
Constitutional  
Rights**

**Family and family  
law in general**

**Marriage and  
Cohabitation**

**Creation,  
Existence, and  
Validity of Marital  
Relationship**

**In General;  
Requisites and  
Essentials**

**Persons Who May  
Marry**

Notes

Quick  
Check